

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

PARETEUM CORPORATION, *et al.*,

Debtors.

Chapter 11

Case. No.: 22-10615 (LGB)

(Jointly Administered)

Related to Docket No. 53

Hearing Date: August 10, 2023 at 10:00 a.m.
Objection Date: August 3, 2023 at 4:00 p.m.

**MOTION FOR ENTRY OF AN ORDER, PURSUANT TO LOCAL
BANKRUPTCY RULE 2090-1(e), TO WITHDRAW AS ATTORNEYS OF RECORD**

Montgomery McCracken Walker & Rhoads LLP, as counsel to Channel Ventures Group, LLC (the “Client”), hereby submits its Motion for an Order Granting the Withdrawal of David M. Bunker, Maura I. Russell, and the law firm of Montgomery McCracken Walker & Rhoads LLP (“MMWR”) as attorneys of record for the Client in connection with the above-captioned case (the “Case”). (See Docket No. 53 - *Notice of Appearance and Demand for Service of Papers*).

The undersigned also seeks an Order granting the removal from all service lists in the Case, including all service lists maintained by Kurtzman Carson Consultants, claims agent, and the Court’s ECF notification system.

In support of this Motion, MMWR respectfully states as follows:

The Client’s interest in the Case has substantially ended.¹ The undersigned’s formal representation of the Client in the Case concluded on February 1, 2023, and the Client consents to

¹ On June 14, 2022, Telx-Santa Clara LLC filed its *Objection to the Omnibus Motion for Entry of an Order Authorizing the Assumption of Certain Commercial Executory Contracts Pursuant to 11 U.S.C. § 365(a) and Granting Related Relief* [Docket No. 111] (the “Telx Objection”). Upon information and belief, the Telx Objection remains the only outstanding issues related to the Client. The latest adjourned date for the hearing on the Telx Objection is October 3, 2023. MMWR was instructed by the Client to do no further work as of February 1, 2023 when it reached final settlement with the TEUM Liquidating Trust. MMWR was further instructed by the Client that the Client would address any remaining issues, including with respect to Telx, and interact directly with respective counsel.

the relief requested in this Motion.

The Motion is submitted pursuant to Local Bankruptcy Rule 2090-1(e) of the United States Bankruptcy Court for the Southern District of New York, which provides that an attorney may not withdraw an appearance as attorneys of record except by order of the Court for the case shown. Therefore, this Motion is necessary.

WHEREFORE, MMWR requests that the Court enter an Order, substantially in the form attached hereto as **Exhibit A**, (i) granting the relief sought in this Motion and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: July 18, 2023

Respectfully submitted,

MONTGOMERY McCracken Walker & Rhoads LLP

/s/ Maura I. Russell
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